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## Community Health Centers of Arkansas, Inc. ARKANSAS PRIMARY CARE ASSOCIATION *Expanding Access to Affordable Quality Health Care*

October 17, 2014

The Honorable Sylvia Matthews Burwell, Secretary  
U.S. Department of Health and Human Services  
200 Independence Avenue, S.W.  
Washington, DC 20201

Dear Secretary Burwell:

Please accept this comment letter on the proposed amendment to the Arkansas Health Care Independence Program demonstration project, which was submitted to the Centers of Medicare & Medicaid Services (CMS) on September 15, 2014. As a part of the provider network that supports the Medicaid population targeted with this demonstration project, we are supportive of most aspects of the Arkansas Health Care Independence Program. However, there are several areas that we would like to express our concerns regarding the proposed amendment.

1. "Only individuals with incomes greater than 100 percent FPL can be denied medical services for failure to pay copayments or coinsurance". As you know, a federally qualified health center cannot deny services for inability to pay and are required to use a sliding fee scale up to 200% of FPL. At a minimum, clarification is needed on the process that will be deployed by the Third Party Administrator in collecting copayments and/or sliding fee scale payments.
2. The Community Health Centers of Arkansas (CHCA) has great concerns about the potential impact that limiting non-emergency transportation services and assessing a "contribution" fee on patients (does this comport with the federal restrictions of limiting cost-sharing on the Medicaid population?) will have on this vulnerable population's access to quality medical care.

Thank you for your willingness to consider our comments.

Sincerely,

Mary Leath, Chief Executive Officer